

## **EXHIBIT D**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

In re	)	Chapter 11
	)	
TELEGLOBE COMMUNICATIONS	)	Jointly Administered
CORPORATION, <i>et al.</i> ,	)	Bankr. Case No. 02-11518 (MFW)
	)	
Debtors.	)	
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TELEGLOBE COMMUNICATIONS	)	
CORPORATION, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 04-CV-1266 (SLR)
	)	
BCE INC., <i>et al.</i> ,	)	
	)	
Defendants.	)	

**CERTIFICATION PURSUANT TO  
DISTRICT OF DELAWARE LOCAL RULE 7.1.1**

Pursuant to Local Rule 7.1.1, counsel for Plaintiffs first provided a copy of the proposed Amended Complaint to counsel for Defendants on August 2, 2005, and sought to determine if Defendants opposed the motion. On August 26, 2005, after several interim attempts to arrive at an agreement counsel for Defendants agreed to consent to the proposed Amended Complaint on condition that Plaintiffs' counsel agreed to extend the discovery deadline in this case a full two months, until December 15, 2005. The condition Defendants sought to impose is not acceptable to Plaintiffs and thus Plaintiffs understand this motion to be opposed.

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Gregory V. Varallo (No. 2242)  
C. Malcolm Cochran, IV (No. 2337)  
Russell C. Silberglied (No. 3462)  
Chad M. Shandler (No. 3796)  
Anne Shea Gaza (No. 4093)  
varallo@rlf.com  
cochran@rlf.com  
silberglied@rlf.com  
shandler@rlf.com  
gaza@rlf.com

Richards, Layton & Finger P.A.  
One Rodney Square  
Wilmington, Delaware 19810  
Telephone: (302) 651-7700  
Facsimile: (302) 651-7701  
Attorneys for Teleglobe Communications  
Corporation, *et al.*

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Kevin A. Gross (No. 209)  
Joseph A. Rosenthal (No. 234)  
kgross@rmgglaw.com  
rmgg@rmgglaw.com  
Rosenthal, Monhait, Gross & Goddess, P.A.  
1401 Mellon Bank Center  
P.O. Box 1070  
Wilmington, Delaware 19801  
Telephone: (302) 656-4433  
Facsimile: (302) 658-7567

-and-

John P. Amato  
Mark S. Indelicato  
Zachary G. Newman  
Jeffrey L. Schwartz  
Robert J. Malatak  
Hahn & Hessen LLP  
488 Madison Avenue  
New York, New York 10022  
Telephone: (212) 478-7200  
Facsimile: (212) 478-7400  
Attorneys for Official Committee of Unsecured  
Creditors of Teleglobe Communications  
Corporation, *et al.*

Dated: August 30, 2005